



U.S. Department of Justice

United States Attorney
Southern District of New York

MEMO ENDORSED

86 Chambers Street, 3rd Floor
New York, New York 10007

June 30, 2008

BY HAND

The Honorable Lawrence M. McKenna
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1640
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 7/8/08

Re: *Stein v. United States of America*, 07 Civ. 2684 (LMM)

Dear Judge McKenna:

I write respectfully to request a two-month extension of the parties' time to file the joint pre-trial order in the above-referenced case, from June 30, 2008 until August 30, 2008. The parties are currently engaged in settlement discussions, and, if possible, would like to avoid the expense of pre-trial preparations. Plaintiff has made a settlement demand on the Government and the Government is endeavoring to obtain the necessary approval from Washington to make a counteroffer. The extension is also requested because Government counsel is scheduled for a week long trial in *Akinyemi v. Chertoff*, 07 Civ. 4048 (AJP), starting on July 28, 2008.

Finally, the plaintiff, who is representing himself *pro se*, has not yet provided the Government with his portions of the pre-trial order. If settlement negotiations are not successful, the plaintiff will need a period of time to complete his portions of the pre-trial order, and the Government will likewise need time to complete its portions of the pre-trial order.

I have spoken with the plaintiff, and he has consented to this request for an extension. Thank you for your consideration of this request.

Approved. So ordered.
LM
7/7/08

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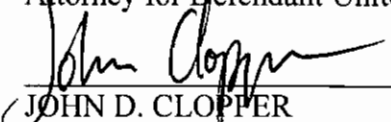
JUL 1 2008

LAWRENCE M. McKENNA
USDJ SDNY

Respectfully,

MICHAEL J. GARCIA
United States Attorney
Attorney for Defendant United States of America

By:



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